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SANCHEZ, VENTO NORTH AMERICA, LLC, and LIME PRO
EQUIPMENT USA*

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

ICON HEALTH & FITNESS, INC.,

Plaintiff,

v.

ISAAC CALDERON, MAHONRY J.
SANCHEZ, VENTO NORTH AMERICA,
LLC, and LIME PRO EQUIPMENT USA,

Defendants.

Case No. 3:12-cv-02029 JAH WMc

JOINT MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT

Complaint Filed: August 16, 2012

1. Pursuant to CivLR 7.2 and 12.1, by and through counsel, and with the stipulation of Plaintiff ICON HEALTH & FITNESS, INC. ("ICON"), Defendants Isaac Calderon, Mahonry J. Sanchez, Vento North America, LLC, and Lime Pro Equipment USA ("Defendants") hereby move the Court for an order setting the time in which Defendants may file their answer or otherwise respond to the Complaint to Friday October 5, 2012.

2. ICON HEALTH & FITNESS, INC. ("ICON" or "Plaintiff") filed its Complaint on August 16, 2012, alleging trademark infringement under the Lanham Act, false designation and unfair competition under the Lanham Act, common law unfair competition and trademark infringement, unfair competition under CA Bus. & Prof. Code § 17200, and false marking under 35 U.S.C. §292 against defendants.

3. Defendants agreed to accept service as of August 30, 2012 as reflected by the Acceptance of Service to be filed concurrently herewith. Based on that, the current responsive pleading deadline is September 21, 2012.

4. "Good cause" exists to justify the proposed extension. There are multiple causes of action against Defendants. Strategy on a responsive pleading will initially entail a substantial examination of each of those various causes of action and related allegations.

5. An extension of time to October 5, 2012 to explore the allegations raised in the Complaint will not prejudice any of the parties as this case is in its infancy.

WHEREFORE, Defendants and ICON jointly move for an extension up to and including October 5, 2012 for Defendants to answer or otherwise respond to ICON's Complaint.

Dated: September 4, 2012

LEWIS KOHN & FITZWILLIAM LLP

By: /s/ Kent M. Walker
Kent M. Walker (173700)

Attorneys for Defendant
ISAAC CALDERON, MAHONRY J.
SANCHEZ, VENTO NORTH
AMERICA, LLC, and LIME PRO
EQUIPMENT USA

Dated: September 4, 2012

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By: /s/ Tyson K Hottinger
Tyson K Hottinger (253221)

Attorneys for Plaintiff
ICON HEALTH & FITNESS, INC.

CERTIFICATE OF SERVICE

I hereby certify the following: I am over the age of 18 years and am not a party to the above-captioned action. I am a registered user of the CM/ECF system for the United States District Court for the Southern District of California.

On September 4, 2012, I electronically lodged the foregoing document with the Court Court using the CM/ECF system. To the best of my knowledge, all counsel to be served in this action are registered CM/ECF users and will be served by the CM/ECF system.

I declare under penalties of perjury under the laws of the United States that the foregoing is true and correct.

/s/ Kent M. Walker

KENT M. WALKER

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